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May 1, 2015

Mr. Robert Werner, Enforcement Officer (6SF-TE)
United States Environmental Protection Agency, Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Re: General Notice Letter for the CES Environmental Services, Inc. Site
Houston, Harris County, Texas

Dear Mr. Werner:

The Lubrizol Corporation ("Lubrizol") is in receipt of the aforementioned General Notice Letter for the CES Environmental Services, Inc. Site located at 4904 Griggs Road, Houston, TX ("Site"). As you are probably aware, Lubrizol, our technical, or our legal advisors have had several discussions with various EPA representatives (specifically Mr. Gary Moore, current EPA On-Scene Coordinator and Ms. Amy Salinas, Assistant Regional Counsel) regarding Lubrizol's intent to cooperate regarding resolution of our potential liability at the Site. Since late 2014, Lubrizol has been in discussions with representatives from the Texas Commission on Environmental Control (TCEQ), the Texas Attorney General, the Bankruptcy Trustee, and the Bankruptcy Trustee's counsel to reach agreement on several issues related to the Bankruptcy proceeding and the Site. It is Lubrizol's intent to volunteer to resolve the environmental issues at the Site through the TCEQ Voluntary Clean-up Program (VCP). To date, progress has been made on several issues and we are awaiting final approval by all of the interested parties before filing a motion with the Bankruptcy Court to address bankruptcy-related issues thus enabling a concurrent filing of the VCP application for the Site with TCEQ.

Lubrizol has also attempted to form a PRP Group of other potentially responsible parties; however most parties are not interested and/or not financially able to participate on a per capita basis. Based upon our initial investigation, no allocation for the Site has been developed and we have minimal basis for establishing an allocation on current information. While Lubrizol has received copies of business records associated with the operation of CES Environmental Service, Inc., a large majority of the files were corrupt or unreadable. We are awaiting copies of these business records from EPA (reference FOIA Request # EPA-R6-2015-005289) to enable the review of the CES Environmental Service, Inc. operation and develop an allocation.

Through these efforts, it is our belief that Lubrizol has shown a good faith effort to cooperate and resolve the issues at the Site. It is our hope that EPA will work with Lubrizol as we try remedy the

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Site conditions through the TCEQ VCP. We would also request that EPA work with Lubrizol as we develop an allocation for the Site, form a PRP Group, and ultimately seek cost recovery.

If you should have any questions, please feel free to contact me at karen.walter@lubrizol.com or 440-347-5028.

Sincerely,

The Lubrizol Corporation

A handwritten signature in black ink, appearing to read "Karen L. Walter", written over the printed name.

Karen L. Walter
Counsel



The Lubrizol Corporation
29400 Lakeland Boulevard
Wickliffe, Ohio 44092-2298

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Dallas, TX 75202-2733



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